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May 7, 2021

By ECF

Honorable Steven L. Tiscione
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Taylor v. City of New York, et al.*
No. 18-cv-5500 (KAM)(ST)

Dear Judge Tiscione:

I write on behalf of Plaintiff Rhian Taylor to respectfully request an unsealing order for records contained in three sealed criminal cases that this Court ordered to be produced during the discovery hearing held on April 26. Defendants consent to this request.

On April 1, Plaintiff filed a motion to compel document discovery. On April 26, the Court granted Plaintiff's motion in part, directing Defendants to review and produce certain records related to eyewitness Seprel Turner in two cases involving the prosecutions of alleged Snow Gang members—*People v. Lucas et al.* and *People v. Barshawn Ford*—as well as records related to *Brady* violations that occurred in another case prosecuted by Plaintiff's trial prosecutor, *People v. Nathaniel Newson et al.*

Defendants have indicated that the *Lucas*, *Ford*, and *Newson* cases are sealed pursuant to CPL 160.50. Mr. Lucas, as well as Mr. Newson and several of his co-defendants, brought civil lawsuits against the City of New York after their respective cases were dismissed, and as such, Corporation Counsel already possesses records related to the *Lucas* and *Newson* cases. However, Assistant Corporation Counsel Philip DePaul has informed undersigned counsel that the Queens County District Attorney's Office will not permit him to access or review the *Ford* prosecution file absent a court order unsealing this information. Accordingly, Plaintiff asks that this Court grant his request for an unsealing order with respect to all three cases. Thank you for your Honor's consideration.

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Respectfully submitted,

/s/

Haran Tae
Counsel for Plaintiff

cc: Philip DePaul, Esq. (by ECF)
Counsel for Defendants